

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	No. 07 CR 721
v.)	
)	Judge Joan H. Lefkow
ARTHUR DEEREY, and)	
DANIEL DEEREY)	

SECOND AGREED MOTION TO EXTEND PRETRIAL MOTIONS

Now comes the defendant, ARTHUR DEEREY, by and through his attorneys Perkins Coie, LLP., and respectfully moves this Honorable Court to enter an order extending the date for filing pretrial motions by 60 days to March 17, 2008, for both of the above-referenced defendants. In further support of this motion, the following is asserted:

1. Defendants were indicted on November 1, 2007.
2. On November 20, 2007, the Court entered an order that pretrial motions be filed on or before December 18, 2007, with responses filed on or before January 2, 2008, and replies on or before January 9, 2008. The Court granted an agreed motion to extend the date for filing of pretrial motions to January 17, 2008.
3. Both defendants request an extension of time of 60 days for the filing of pretrial motions until March 17, 2008, to make a full and informed decision on what, if any motions to file, given the complexity of the case and voluminous nature of the documents involved.

4. On January 14, 2008, Matthew Gulde, attorney for defendant DANIEL DEEREY, informed below counsel that DANIEL DEEREY agreed to the 60-day extension of time to file pretrial motions and requested that the same extended schedule be applied to him.

5. On January 15, 2008, Assistant U.S. Attorney Stephen Kubiowski informed below counsel that he agreed to the 60 day extension of time to file pretrial motions as to both defendants.

6. All the parties have agreed to exclude time in the interests of justice until March 17, 2008.

WHEREFORE, it is respectfully requested that the Court grant an extension of the time for the filing of pretrial motions in this matter for the aforementioned reasons.

Respectfully submitted,

/s/Pravin Rao
THEODORE T. CHUNG
PRAVIN B. RAO
Attorneys for Defendant
Perkins Coie, LLP
131 South Dearborn, Ste. 1700
Chicago, IL 60603
(312) 324-8552

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the following document:

DEFENDANT'S SECOND AGREED
MOTION TO EXTEND PRETRIAL MOTIONS

was served on January 15, 2008, in accordance with Fed. R. Crim. P. 49, Fed. R. Civ P. 5, LR 5.5, and the General Order on Electronic Case Filing (ECF) pursuant to the district court's system as to ECF filers, on Assistant U.S. Attorney Stephen Kubiowski at 219 South Dearborn, Ste. 500, Chicago, IL 60604, and on Matthew J. Gulde, attorney for DANIEL DEEREY, at Stetler & Duffy, ltd., 11 South LaSalle Street, Suite 120, Chicago, Illinois 60603.

/s/Pravin Rao
THEODORE T. CHUNG
PRAVIN B. RAO
Attorneys for Defendant
Perkins Coie, LLP
131 South Dearborn, Ste. 1700
Chicago, IL 60603
(312) 324-8552